

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JADE ALEXANDER BEAVIN,

Defendant.

NO. CR22-103 RAJ

DISCOVERY PROTECTIVE ORDER

This matter, having come to the Court's attention on the Stipulation for Entry of a Discovery Protective Order submitted by the United States of America and Defendant Jade Alexander Beavin, and the Court, having considered the motion, and being fully advised in this matter, hereby enters the following PROTECTIVE ORDER:

1. Protected Material

The following are deemed Protected Material: uncharged incident reports containing personal identifying information of victims. The United States will make available copies of the Protected Material, including those filed under seal, to defense counsel to comply with the government's discovery obligations. Possession of copies of the Protected Material is limited to the attorneys of record, and investigators, paralegals, law clerks, experts, and assistants for the attorneys of record (hereinafter collectively referred to as members of the defense team).

1 2. Scope of Review of Protected Material

2 Defense attorneys of record and members of the defense team may display and
3 review the Protected Material with the Defendant. The attorneys of record and members
4 of the defense team acknowledge that providing copies of the Protected Material to the
5 Defendant and other persons is prohibited, and agree not to duplicate or provide copies of
6 Protected Material to the Defendant and other persons. Notwithstanding the terms of this
7 Order, defense counsel may provide electronic copies of any Protected Material to the
8 Education Department in the Federal Detention Center at SeaTac, Washington, along
9 with a completed copy of the FDC's Electronic Discovery and Legal Material
10 Authorization Form. Defendant will not be permitted to have a copy of this material in
11 his cell, but may review it at the FDC Education Department pursuant to BOP and FDC
12 SeaTac's policies and procedures.

13 3. Consent to Terms of Protective Order

14 The attorney of record for the Defendant is required, prior to disseminating any
15 copies of the Protected Material to permitted recipients, such as other members of the
16 defense teams, to provide a copy of this Protective Order to those permitted recipients,
17 and to obtain the written consent by those recipients of the terms and conditions of this
18 Protective Order. Such written consent shall not, however, be required with respect to
19 members of the defense teams who are employed by the same office as the attorney of
20 record; in such case, it shall be sufficient for the attorney of record to provide a copy of
21 this Protective Order to such other members of the defense teams and to remind them of
22 their obligations under the Order. The written consent need not be disclosed or produced
23 to the United States unless requested by the United States Attorney's Office for the
24 Western District of Washington and ordered by the Court.

25 ///

26 ///

